

201-14486



NCIC HPV

Sent by: Mary-Beth
Weaver

05/22/2003 01:35 PM

To: NCIC HPV, moran.matthew@epa.gov

cc:

cc:

Subject: Environmental Defense statement on the proposed Fatty Nitrogen
Derived Amines category



Richard_Denison@environmentaldefense.org on 05/20/2003 05:13:01 PM

To: oppt.ncic@epamail.epa.gov, hpv.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Karen
Boswell/DC/USEPA/US@EPA, Miriam-Azimi-Osman@americanchemistry.com
cc: LUCIERG@msn.com, mtc@mchsi.com, kflorini@environmentaldefense.org,
rdenison@environmentaldefense.org

Subject: Environmental Defense statement on the proposed Fatty Nitrogen Derived Amines category

(Submitted via Internet 5/20/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov,
boswell.karen@epa.gov, chem.rtk@epa.gov and
Miriam Azimi-Osman@americanchemistry.com)

Environmental Defense submits this statement regarding the robust
summary/test plan for the proposed Fatty Nitrogen Derived Amines category.

The robust summary and test plan for this proposed category were submitted
by the American Chemistry Council's Fatty Nitrogen Derivatives Panel Amines
Task Group on 12/23/02, and were posted on EPA's ChemRTK website on
1/23/03, with a due date for comments of 5/23/03.

In its submission the ACC Panel indicated that it anticipated significantly
revising these documents by no later than the end of March 2003. As of
this writing, those revisions apparently have yet to be submitted and
revised versions of the test plan and robust summary have not yet been
posted on EPA's website.

For these reasons, we have opted to defer comments on this submission until
the revised documents are made available. We urge that EPA provide a
suitable comment period for review of the revised documents, and we reserve
the right to provide our comments at that time.

Given the complexity and size of this proposed category, we are concerned
about the delay in submitting a complete test plan and full set of robust
summaries, because any needed further data development cannot proceed in
earnest prior to their submission and review. Lest this delay compromise
the ability of the Panel to complete data development for the chemicals
covered by this proposed category in a timeframe compatible with that of
the HPV Challenge Program, we urge the sponsor to expedite the needed
revisions and submit the revised documents as soon as possible.

Thank you.

Richard Denison, Ph.D.
Senior Scientist, Environmental Defense

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